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March 15, 2006

Hon. Nina Gershon  
United States District Court  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: U.S. v. Shahawar Matin Siraj  
Cr-05-104

Dear Judge Gershon:

We submit this letter in connection with the requests to charge submitted by the government under a cover letter dated March 7, 2006.

On the whole, the requests submitted for the elements of the crimes charged in the indictment seem satisfactory. The one minor change we would seek would be to include the phrase "none of them being government informants or agents" in the 5<sup>th</sup> paragraph of the initial definition of conspiracy (Request Number Two).

With respect to the entrapment charge, we would modify it as noted in the attached Request, with proposed modifications being underlined.

This letter and the attachment have been filed via ECF today and faxed to the government.

Very truly yours,

Martin R. Stolar

MRS/s  
cc: Todd Harrison, Esq.; Marshall Miller, Esq.  
Shahawar Matin